

EXHIBIT A-2

CAUSE NO. 2016-31648

COBALT INTERNATIONAL
ENERGY, INC.

Plaintiff,

vs.

XL SPECIALTY INSURANCE CO.

Defendant.

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

125TH JUDICIAL DISTRICT

**DEFENDANT XL SPECIALTY INSURANCE COMPANY'S ORIGINAL
ANSWER AND REQUEST FOR DISCLOSURE**

Defendant XL Specialty Insurance Company files this original answer to Plaintiff Cobalt International Energy, Inc.'s Original Petition.

A. General Denial

1. Defendant generally denies the allegations in Plaintiff Cobalt International Energy, Inc.'s original petition.

B. Request for Disclosure

2. Pursuant to Rule 194, Plaintiff Cobalt International Energy, Inc. is requested to disclose, within 30 days of service of this request, the information or material described in Rule 194.2.

C. Affirmative Defenses

3. No coverage is available under the XL Policy for the SEC Investigation because Cobalt failed to provide timely notice.

4. No coverage is available under the XL Policy for the Claims comprising the Active Litigation because they are not Claims first made or deemed first made during the Policy Period of the XL Policy.

5. No coverage is available under the XL Policy for the derivative demands made to Cobalt because the derivative demands are not Claims first made or deemed first made during the Policy Period of the XL Policy.

6. Cobalt's claims are barred by the common law doctrines of fortuity, known loss, and loss in progress.

WHEREFORE, for these reasons, Defendant XL Specialty Insurance Company prays that Plaintiff's Petition be dismissed with prejudice or in the alternative, that Plaintiff take nothing on its claims and that Defendant XL Specialty Insurance Company be granted any other relief to which it may be entitled by law.

Respectfully submitted,

/s/ J. Andrew Love

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**ATTORNEYS FOR DEFENDANT XL
SPECIALTY INSURANCE COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was served on all counsel of record in this case, identified below, on June 8, 2016 electronically through the electronic filing manager or through email per the parties' agreement.

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/s/ J. Andrew Love
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Unofficial Copy Office of Chris Daniel District Clerk